

EXHIBIT A



March 28, 2025

FOIA REQUEST - Department of State

Dear FOIA Officer:

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I request:

All cable traffic between March 1, 2025 and March 28, 2025 from the State Department to and from the U.S. Embassy in El Salvador regarding the deportation of unauthorized Venezuelan and El Salvadoran immigrants from the United States to El Salvador for detention in the Centro de Confinamiento del Terrorismo (CECOT).

Included in this request are copies of any contracts or other fiduciary instruments involved in, and any explanation of, the payment of approximately \$6 million to the Government of El Salvador (GOES) by the Government of the United States for the detention of 238 Venezuelan and 23 Salvadoran deportees.

I ask that you restrict your search only to electronic records and that you provide responses in electronic format.

I am available to discuss the scope of the request and any questions by phone (202-361-0696) or email (t.christian.miller@propublica.org).

As a representative of the news media I am only required to pay for the direct cost of duplication after the first 100 pages. This information is being sought on behalf of ProPublica, an independent, non-profit news organization, for dissemination to the general public.

Please waive any applicable fees. Release of the information is in the public interest because it will contribute significantly to public understanding of government operations and activities. As a non-profit journalistic entity, ProPublica does not have the same commercial interests of other news organizations.

If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the Act. I will also expect you to release all segregable portions of otherwise exempt material. I, of course, reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

I also ask that this request be expedited under terms of the Freedom of Information Act. Expedited processing is allowed for requests that show a “compelling need,” and ProPublica is primarily engaged in disseminating information, with an urgency to inform the public concerning federal government activity.

As the Act states, you have 10 days to decide whether to grant expedited processing.

Since ProPublica is an organization primarily engaged in disseminating information, our rationale for expedited processing under the “compelling need” stipulation meets all three factors enumerated by the State Department in weighing whether to grant such a request.

First, the deportation of 238 undocumented Venezuelan immigrants and 23 undocumented Salvadoran immigrants from the United States to El Salvador is a matter of current exigency to the American public. Since the deportation became known to the public on March 15, 2025, major news organizations have published more than 500 articles regarding the transfer, according to Factiva, a news tracking service.¹ There is an urgent need to understand the policy and practical rationale behind the decision to send illegal aliens to El Salvador.

Second, there is a serious risk of the loss of substantial due process rights. Indeed, due process questions are at the heart of an ongoing federal judicial inquiry into the actions of the Department of Homeland Security and whether they violated deportees due process rights.²

Finally, the failure to obtain the records within an expedited deadline could reasonably be expected to pose an imminent threat to the deported aliens life or physical safety. The deportees have been detained in the GOES Centro de Confinamiento del Terrorismo (CECOT). The Department of State, in its own 2023 Country Report on Human Rights Practices in El Salvador notes the “harsh and life-threatening prison conditions” in the country.³

ProPublica is a non-profit, investigative newsroom primarily engaged in disseminating information in the public interest. Since we began publishing in 2008, ProPublica has received seven Pulitzer Prizes, fifteen George Polk Awards, and five Peabody Awards, among other recognitions of journalistic excellence. We publish content daily on our website, propublica.org. Our newsroom has been actively covering immigration issues, and in requesting these records, would primarily engage in disseminating information (i.e., reviewing and reporting on these records and sharing our findings with the public) where there is “an urgency to inform the public concerning actual or alleged Federal Government activity,” as the compelling need provision requires.

¹ See, for example, articles from the [Associated Press](#), [The New York Times](#), and the [Washington Post](#).

² Feuer, Alan. “Administration’s Details on Deportation Flights ‘woefully Insufficient,’ Judge Says.” *The New York Times*, *The New York Times*, 20 Mar. 2025, www.nytimes.com/2025/03/20/us/politics/trump-deportation-venezuela-tren-de-aragua.html.

³ “2023 Country Reports on Human Rights Practices: El Salvador.” U.S. Department of State, U.S. Department of State, www.state.gov/reports/2023-country-reports-on-human-rights-practices/el-salvador/. Accessed 28 Mar. 2025.

I certify that my statements concerning the need for expedited processing are true and correct to the best of my knowledge and belief.

I look forward to your reply, as the statute requires.

Thank you for your assistance.

Sincerely,

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